MADISON COUNTY PLANNING BOARD

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STAFF REPORT June 19, 2007

PROPOSED: Lone Moose Meadows Overall Development Plan

Landowner: Thumb Development, LLC

P.O. Box 161470 Big Sky, MT 59716

Landowner Representative: American Land Development, LLC

424 E. Main Street, Suite 203A

Bozeman, MT 59715

DISCLOSURE

In accordance with the Madison County Subdivision Regulations, the County Planning Director was supposed to submit a notice of the June 25th meeting about this ODP to *The Madisonian*, for publication by June 10th. She forgot to do this. To compensate for her error, the Planning Director submitted a display ad to the *Bozeman Daily Chronicle* (for publication on June 17th) <u>and</u> the *Lone Peak Lookout* (for publication the week of June 18th). In addition, she distributed a press release on the June 25th meeting to all local newspapers, for publication the week of June 18th.

BACKGROUND

Thumb Development, LLC and Lone Moose Meadows, LLC are working jointly to develop the 535-acre Lone Moose Meadows recreational resort. The property lies directly south of MT 64, in Sections 28 and 29 of Township 6 South, Range 3 East between the Meadow and Mountain Villages of Big Sky. Lone Moose Meadows, LLC owns the 350 acres located in Gallatin County; Thumb Development, LLC owns the 185 acres to the west, in Madison County. The Middle Fork of the West Fork of the Gallatin River runs through the site (See Attachment One for Big Sky-Madison County location map and photos of the Lone Moose Meadows site).

Development of the Gallatin County portion is covered by an approved Master Planned Unit Development (MPUD) calling for 500 density units, with 75% of the land area to remain as open space. The site will include a hotel and village located close to MT 64, with clusters of residential homesites and condominium units below. The site is presently served off MT 64 by one primary access, a paved public road known as Lone Moose Drive. Construction of a secondary access on the Gallatin County side began several years ago and was intended to loop back to MT 64. However, the route was deemed unsuitable due to geotechnical and wetland issues. To date, 28 condominium units have been built on the Gallatin County side, along the river. Future development hinges on the developer's ability to provide a secondary access that is acceptable to Gallatin County.

Residential and commercial development on the Madison County side would occur in accordance with a proposed Overall Development Plan (ODP). Madison County requires submittal of an ODP whenever a tract of record is proposed to be subdivided in phases, rather than all at once.

The Lone Moose Meadows ODP proposes up to 153 density units¹, to be built as follows:

- 20 single-family lots, 1-2 acres in size;
- 33 condominium units on 11 triplex lots, 1/2-3/4 acre in size²; and
- A condominium lodge with up to 100 units, a restaurant, and a bar.

Approximately 120 of the 185 acres would remain in open space, with opportunities for year-round recreation. Two or more subdivision phases would occur.

Primary access to the Lone Moose Meadows-Madison County side would be via two new approaches off MT 64. One would come in at the west end of the property, and the other would be sited between this spot and Lone Moose Drive. Secondary access is proposed to extend along the south side of the river, east into Gallatin County in order to connect with Lone Moose Drive.

The terrain is generally steep, with slopes in excess of 20%. Some areas are at 70% slope. According to the ODP, proposed building sites would be located on slopes of 25% or less, and proposed road grades would not exceed 11%. Building sites would avoid the Madison County 100' minimum stream setback along the Gallatin River, as well as the Lake Lewinsky dam break floodway.

The ODP contains an environmental assessment that includes:

- A preliminary wetland delineation report by Pioneer Environmental Services, Inc. Nine channels and 23 wetlands are identified.
- A wildlife studies report prepared by Doctors R.L. Eng and H.D. Picton. The report provides a late fall-early winter assessment of mammal activity on the property. The bird assessment is more comprehensive.
- A Phase 1 geotechnical assessment report prepared by Rimrock Engineering, Inc. The report discusses the results of one test pit analysis and field observations on a portion of the property.
- A traffic accessibility study by Engineering, Inc. The study uses 587 residential density units (500 on the Gallatin side, and 87 on the Madison side) to predict average daily traffic and make recommendations for MT 64 and Lone Moose Drive.
- Stated intentions to NOT connect the existing Low Dog Road in Cascade Subdivision (Mountain Village) with the Lone Moose Meadows road system.
- A traffic management plan that discusses the developer's intentions to provide an internal people moving transportation system, in a manner yet to be determined.
- A Phase 1 noxious weed management plan.
- Madison County/Gallatin County soil survey data and map.
- A set of draft covenants.

• Review agency comments received by May 2007.

- A slope analysis map.
- Reference to the site's location within the Gallatin Canyon Consolidated Rural Fire District.
- Reference to an application for annexation of the site into the Big Sky Water and Sewer District.³

¹ The ODP text sometimes refers to 143 total density units. However, the developer has clarified that a total of 153 density units is proposed.

² The text and maps are not always consistent in their representation of the total number of multi-family units. However, the developer has clarified that a total of 33 condominium units (11 triplex buildings) is proposed.

³ The ODP text also refers the reader to Figures 6 and 7 for preliminary sewer and water plans, but these

were not included in the packet.

- Delineation of a modified Lake Lewinsky dam break floodway, and reference to (but no mapping of) 35' wetland setbacks and the Madison County 100' stream setback along the Gallatin River.
- Reference to plans to obtain any and all permits associated with wetland and stream disturbances.
- Reference to a stormwater management report that would be submitted to the Montana Department of Environmental Quality for review and approval.
- Stated intentions to build all new roads to AASHTO standards and fire access standards.
- Stated intentions to continue to allow non-motorized public recreational use of the skier trail (Middle Fork Trail, or "Poop Chute") along the south side of the Gallatin River.
- Plans to provide five units of supervisory employee housing on the Gallatin County side.

In September 2006, the Madison County Planning Board and Planning Director toured portions of the site with American Land Development (ALD) personnel. During that visit, Lone Moose Meadows Condominium Owners Association President Wayne Lee presented a resolution regarding member concerns about the project (See Attachment Two). Recently, the Madison County Planning Director and Planning Board member Bill Olson, met on-site with Lauren Waterton of ALD. See Attachment Three for a summary of this recent site visit.

ADDITIONAL INFORMATION, PUBLIC and AGENCY COMMENTS

Additional information continues to come in, regarding the proposed ODP. See Attachment Four for a geology review dated May 25, 2007 and given to the County Planning Office on June 14th. The developer plans to provide a map overlaying the ODP development pods with alternative internal road layouts provided by Wayne Lee, but this information has not yet been received.

Additional agency and public comments have also been received. These are provided in Attachment Five.

STAFF DISCUSSION

Although initial Lone Moose Meadows ODP and Phase I pre-application discussions between Thumb Development and Madison County began in the summer of 2006, the plan has changed several times since then. At the end of October 2006, American Land Development provided adjacent landowners and review agencies with revised ODP and Phase I pre-application information. The Lone Moose Meadows ODP and any associated subdivision applications will fall under the Madison County Subdivision Regulations adopted in September 2006.

In accordance with the Madison County Subdivision Regulations, the County Planning Staff have performed an evaluation of project compliance with the 2006 Madison County Growth Policy (See Attachment Six) and the other subdivision review criteria listed below:

A. Effects on Agriculture

The ODP lands have no agricultural value. No information is provided, regarding the existence and/or allocation of water rights.

B. Effects on Agricultural Water User Facilities

There are no agricultural water user facilities affected by this ODP.

C. Effects on Local Services

Local service providers have provided little input, as to their ability to support the proposed development. In her letter dated September 20, 2006, Ophir School Superintendent/Principal

Anne Marie Mistretta emphasizes the expected influx of permanent families into the Big Sky area, due to future plans for a local high school. This influx will bring more children into the local school system.

Three Rivers Communication has indicated that telephone services can be provided to the ODP site. Overhead power lines extend east-west along the north boundary of the site, just below MT 64; a subfeed line runs north-south near the boundary between Gallatin and Madison counties. Thumb Development has approached Northwestern Energy about the possibility of placing at least the main lines underground (at the developer's expense). This would certainly enhance the aesthetics of the project.

In his June 15, 2007 letter, Big Sky Water & Sewer District General Manager Ron Edwards clarifies the fact that the ODP site is not located in the District. Assuming annexation occurs, the new development would contribute to the cost of public water and sewer services. Relocation of the water/sewer easement along the south side of the river may be required, at the developer's expense, in order to position the proposed condo lodge/commercial development properly.

The ODP does not estimate the seasonal or year-round workforce that will be required to support the project. Thumb Development, LLC has committed to providing five units of supervisory workforce housing on the Gallatin side of the Lone Moose Meadows project. ⁴ This appears to be a reasonable commitment for the proposed ODP, as long as commercial development on the Madison side remains somewhat limited in scope. Provisions should be made for ensuring that this workforce housing actually gets built and utilized for the stated purpose. In addition, the developer is urged to amend page 31 of the draft covenants to allow caretaker apartments in conjunction with the single-family residential lots.

The ODP calls for a variety of year-round recreational amenities, and it commits to preserving public access to the existing Middle Fork ski trail (although the trail would likely get relocated, with cooperation of adjoining landowners). The opportunity to provide a connection to the Mountain Village-Meadow Village commuter trail system should be pursued.

Other local services are discussed below, under Public Health and Safety.

School district coffers would increase with the additional property tax base. Similarly, the tax base of Madison County and the Gallatin Canyon Consolidated Rural Fire District would expand, providing additional revenue for certain public service costs.

E. Effects on the Natural Environment

The proposed development would require the Montana Department of Environmental Quality's review and approval for sanitation, water quality and supply, stormwater drainage, and solid waste. The ODP calls for annexation into the Big Sky Water & Sewer District. Assuming this occurs, the project will be well-served by a community water and sewer system.

The Madison County Weed Board has approved a noxious weed management plan for Phase 1 of the project.

Protection of wetlands and the Middle Fork of the West Fork of the Gallatin River is addressed in the ODP. A wetlands analysis has been performed. Once the wetland information for the Gallatin

⁴ Lone Moose Meadows, LLC has not been required to address housing needs associated with the already-approved MPUD in Gallatin County.

County side of the Lone Moose Meadows property has been updated, the developer will submit both reports to the U.S. Army Corps of Engineers (USACOE) for verification of the wetlands delineation. The ODP commits to maintaining a 35' building setback from all wetlands and, in cases where wetlands disturbance will occur due to road construction, the necessary permits will be obtained in advance from USACOE.

The ODP references Madison County's 100' minimum stream setback as a further standard to be imposed upon building sites along the Gallatin River. In areas of riparian vegetation and/or wildlife corridor, the 100' distance may not be enough. However, it is a good start for site planning purposes. Further, the developer acknowledges that bridge replacement will require all necessary permits.

The 100' minimum stream setback would apply to all nine channels described in the wetland report. The developer should keep this in mind, as more site-specific development plans are made.

Although portions of the site have been logged, a good deal of native forest and ground cover remains. Proposed construction activities will require extensive removal of trees and other vegetation, plus significant cut-and-fill associated with road-building. Re-seeding and other erosion control measures will be essential to maintaining water quality, managing stormwater runoff or "sheet flow" as described in the text, and insuring slope stability. Roads should be routed carefully, to minimize hillside earth-moving and scarring. Alternative road layouts have been offered up by Wayne Lee, adjoining landowner and professional surveyor. His plans should be evaluated for their potential to both minimize impact on the natural terrain/ground cover and provide access roads that meet County standards.

Hillside development will alter the scenic landscape enjoyed by Low Dog Road residents just west of the ODP site. Covenants that promote architectural compatibility with the mountainside setting and require strict exterior lighting standards will be key. The draft covenants contain relatively weak language regarding exterior lighting (page 30). They contain no commercial development standards. Commercial projects need design guidelines as much as residential ones, to help ensure that the buildings, signage, lighting, parking and storage areas fit appropriately into the river canyon setting. Since the draft covenants are already tailored to the Gallatin County portion of the Lone Moose Meadows project, it might be wise to apply the Gallatin County Hillside and Ridgeline Development Standards to the Madison side (page 38).

F. Effects on Wildlife and Wildlife Habitat

The wildlife studies report identifies moose, elk, black and grizzly bear, and a variety of smaller mammals as likely species using the site. Mountain lions and bobcats may also be present. The consultants' work was done at a time when "...field observations of animals which may inhabit the area would at best be restricted to the relatively few species which do not migrate and are active during late fall and early winter". Their bird assessment was based upon what is typically found in similar habitat in the Big Sky area.

The report warns of potential attacks by moose, and efforts by bear to den under decks and homes. Riparian areas are important to protect in light of their contribution to vegetative diversity. Elk habitat in this area is still "interconnected and it is likely that the project area receives at least transitory use".

At the June 14th site visit, ALD representative Lauren Waterton indicated that the wildlife consultants are slated to return to the ODP site this summer and make further wildlife observations. The ODP text states that "from the beginning, consideration for wildlife has been part of the overall

planning process for the Lone Moose Meadows project. The clustering concept of Lone Moose Meadows was driven largely by concern for wildlife..." A fuller wildlife assessment is recommended to determine how wildlife use, habitat, and connectivity can be maintained in conjunction with development of the site. The proposed ODP density and development pod/road locations can then be either verified or adjusted accordingly. It is further recommended that the recent Mountain Village area wildlife studies by Boyne USA's wildlife consultant Tom Olenicki be factored into the Lone Moose Meadows assessment, as his examinations fortunately covered the Thumb Development property. As Tom Olenicki has discussed in earlier discussions with the Madison County Planning Board, the recent, large Big Sky developments are squeezing local wildlife into the remaining corridors and pockets of open space. The Lone Moose Meadows ODP site is likely one of these areas.

Draft covenants provided with the ODP make reference to elk calving areas (page 6) and wildlife migration (page 31). It seems that more is known about how wildlife use the property, than what has thus far been presented in the ODP. This information should be shared, and applied in determining development pod and road locations.

G. Effects on Public Health and Safety

See Section E. above for discussion of the project's plans for water supply, water quality protection, and stormwater management.

Traffic safety

The ODP contains a traffic accessibility study focused on evaluating the entire Lone Moose Meadows project impact on MT 64. Post-construction commercial traffic is not factored in, and the residential density figure used for the Madison side is only 87, rather than 153. The study works off of an outdated ODP site plan showing the "middle" subdivision road as a "driveway" serving 5 single-family lots. The ODP now shows 18 multi-family units along this route.

The study describes Lone Moose Drive as a "rural local road". According to ALD, the engineers have determined that Lone Moose Drive meets AASHTO standards, but some of its curves would benefit by signage and widening at curves. The issue of whether or not Lone Moose Drive would retain its "rural mountain road" classification, under full build-out, is not addressed. Sight distance issues at the two proposed new MT 64 access points are identified, and the recommended solution is to modify the northside embankment along MT 64. Such an undertaking would require approval by the Montana Department of Transportation (MDT). Further, MDT may have concerns about the ROW encroachment which shows up on the ODP's internal subdivision road layout, as well as the fact that the primary access road ("Upper Low Dog Road") abuts the MT 64 ROW, which includes a very steep embankment on the south side.

The traffic study concludes that, with improvements as described, MT 64 in the near vicinity of the project would continue to function at Levels of Service A or B, except the portion between Ciel Drive and Beehive Creek Drive is already Level C and would remain such. No explanation is given, for why this highway segment functions at a lower Level of Service.

The entire ODP is dependent upon Thumb Development's ability to get MDT approval of the two new access points off of MT 64, plus MDT cooperation regarding the ROW and embankment issues associated with the two upper subdivision roads. Approach permit applications and road plans have only recently been submitted to MDT, and their review and preliminary analysis should precede any decision by Madison County to accept the proposed ODP design or density. MDT's ultimate decision affects nearly every element of this project.

No mention is made in the traffic study of the impact of the Lone Moose Meadows project on lower portions of MT 64, or USH 191 itself. Thumb Development should participate, along with other major developers in the Big Sky community, in a solution for the intersection of MT 64 and Ousel Falls Road. Deficiencies were identified at this intersection several years ago, but a funding plan is not yet in place to address them.

Emergency services

Emergency response times to the Thumb Development property are short. The ODP contains several features found satisfactory by the Madison County Office of Emergency Management. Water supply for firefighting would be handled through fire hydrants connected to the community water system. Accessibility is addressed via the plan for subdivision roads to be built to County standards, with the provision of secondary/emergency access using Lone Moose Drive. What is unknown at this time is whether or not Gallatin County will approve a MPUD amendment allowing the Madison side to serve as secondary access to the Gallatin side.

Subdivision covenants would need to include the fire-resistant roofing materials, defensible space requirements, sprinkler systems, etc. that are required of all properties located within the GCCRFD. To date, Fire Chief Jason Revisky has not provided comments on the ODP. Development would have to occur in accordance with all Fire Department standards. Covenant references to a security checkpoint (page 7) and the possibility of private roads (page 12) must be deleted, as all subdivision roads in Madison County are required to be accessible to the public.

In the past, Madison County has required a fuels management plan as part of the ODPs for the Yellowstone Club, Mountain Village, Spanish Peaks Resort, and Moonlight Basin Ranch. This requirement recognizes the wildfire risks associated with placing developments in the "wildland/urban interface" which characterizes virtually all of the Big Sky community. The Lone Moose Meadows ODP should include such a plan.

The medical clinic at Mountain Village is only minutes away from the Thumb Development site, but Bozeman Deaconess Hospital is a one-hour drive. This distance continues to be a public health and safety issue, which is being addressed by recently announced plans for an emergency care facility in the Meadow Village.

Geological risks

The ODP contains a geological assessment report from Rimrock Engineering, Inc., covering 27 Phase 1 building sites, at a time when Phase 1 envisioned only two single-family lots in the north central portion of the property (now, the ODP calls for 18 multi-family units here). The report refers to two test pits, but provides information on only one, located towards the west side of the property. The stability of proposed subdivision road routes is not addressed. There is no map identifying geology-related hazards, nor any description of geological conditions as required by the 2006 Madison County Subdivision Regulations (page 70).

The May 25, 2007 letter from Rimrock (Attachment Four) is apparently intended to serve as a geological review for the entire ODP area. Engineers visited the site on May 24th and compared their observations with the generalized information available from the Madison County Soil Survey and USGS/MT Bureau of Mines and Geology maps.⁵ Their May 25th letter concludes "...that there are not any geological hazards that would preclude development on this site with proper design and construction practices". The engineers recommend site/structure-specific geotechnical investigations be performed prior to any construction.

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⁵ The soil survey and geology maps are the same materials that the County Planning Staff use in preapplication reviews, to determine if the subdivider will be required to provide a geological review.

However, the same letter also identifies slope stability issues, landslides, and slopes that have been cut during prior logging road construction/harvest. The letter refers to "inherent risks involved with building in this area", and "multiple risk factors associated with development in the project site's area..."

The geological information that has been provided to date does not meet the requirements of the Madison County Subdivision Regulations. It is too generalized and lacking in maps which would identify and evaluate geology-related hazards vis-à-vis proposed development pod and road locations. The subdivision regulations state, "Approved overall development plans (ODPs) shall demonstrate that future developments will be concentrated in areas of low to moderate risk" (p. 70). The information provided to date offers no such demonstration.

It is well known that MT 64 in the immediate vicinity of the Thumb Development site has had landslide issues. Immediately east of the Madison County line, on the Gallatin side of the Lone Moose Meadows project, construction of a secondary access road was stopped due to both geological and wetland issues. The ODP text itself (page 18) presents a puzzling statement: "The ODP area appears to be geologically stable, and potential slides originating in upslope areas would be directed into drainage ways and away from buildings by the topography." If this is the case, it should be demonstrated, using maps based on the geoscience that produced such a conclusion.

Avalanche hazard

The ODP provides no information regarding avalanche risk on the property. An assessment of risk and mitigation measures should be provided, with particular attention given to development pod and road locations.

Flood hazard

The ODP delineates a modified version of the Lake Lewinsky Dam Break Floodway along the Gallatin River. ALD has explained that the original study by Morrison-Maierle, Inc. engineers mapped Floodway boundary lines that do not match up at the Madison-Gallatin county line. Accordingly, the Thumb Development project team made adjustments on the basis of topography. The Planning Office has asked for clarification as to whether the adjustments were made by a qualified engineer, to help ensure that the building sites closest to the river will in fact be outside the Floodway. The Lake Lewinsky Dam Break Floodway study was done under the auspices of the Montana Department of Natural Resources and Conservation (DNRC), and any proposed changes should be submitted to DNRC for review and approval.

H. Effects on Other Resources in the County

The proposed development would utilize the natural landscape and scenic beauty to expand the recreational amenities and residential offerings at Big Sky. For some people, their appreciation of the area's scenic beauty would be enhanced by the additional high-quality resort development; for others who don't like seeing buildings on mountainsides, the area's scenic beauty would be further diminished by this project.

I. Effects on the Local Economy

The proposed development would provide a sizeable boost to the region's economy. The concept for Lone Moose Meadows is to offer recreational and residential opportunities in a unique combination. If implemented well, this will make the market "pie" bigger, and attract additional visitors and residents to the Big Sky area.

J. Effects on Public Services Provided by Other Entities in the County No apparent issues here that have not been previously discussed.

K. Legal and Physical Access

It is unknown whether or not the development can obtain either legal or physical access. Much depends upon MDT's review of the plans, as well as additional verification of geological conditions. Emergency access plans are fine, as long as Lone Moose Drive can be safely negotiated by emergency service vehicles.

L. Park Dedication

The ODP commits approximately 120 acres of open space, or 65% of the total area. Much of the proposed open space is steep, unbuildable hillside. Some of it encompasses the Lake Lewinsky dam break floodway, which also includes the Gallatin River corridor and associated wetlands. The open space commitment should be expanded to include the isolated single-family unit shown on the site plan at the west end of the property. The steep slope and limited building area make this much better suited to a modest-sized overnight cabin for lot owners and their guests.

Further, Thumb Development has an opportunity to provide an important link in the Mountain Village-Meadow Village commuter trail system. Trail planning should be done in cooperation with the Big Sky community.

PROPOSED FINDINGS OF FACT

- A. Effects on Agriculture No impact.
- B. Effects on Agricultural Water User Facilities No impact.
- <u>C.</u> <u>Effects on Local Services</u> No significant negative impacts, assuming a signed implementation agreement regarding the commitment to provide five units of workforce housing.
- <u>D. Effects on the Natural Environment</u> Negative impacts associated with the extensive cut-and-fill requirements of roadbuilding. Other negative impacts can be mitigated by DEQ water/sewer/stormwater approvals, adequate building setbacks (wetlands, all streams and natural drainages, Floodway), neighbor-friendly covenants, and homesite construction on slopes no greater than 25%.
- <u>E.</u> <u>Effects on Wildlife and Wildlife Habitat</u> Impossible to properly evaluate without more information.
- <u>F. Effects on Public Health and Safety</u> Impossible to properly evaluate without more information, including MDT input, additional geological assessment, and avalanche analysis. Conformance to Gallatin Canyon Consolidated Rural Fire District standards, a fuels management plan, clarification of Floodway delineation, and developer participation in the financing of MT 64 improvements are important mitigating measures.
- G. Effects on Other Resources in the County No apparent impacts.
- H. Effects on the Local Economy Positive.
- J. Effects on Public Services Provided by Other Entities in the County Nothing to add.
- <u>K. Legal and Physical Access</u> Impossible to properly evaluate without more information, including MDT input, additional geological assessment, and avalanche analysis.

- <u>L. Parkland Dedication</u> Positive impacts, assuming skier trail remains a public facility and any rerouting is done in cooperation with neighbors.
- M. <u>Substantial</u> <u>Compliance with the Growth Policy</u> Without more information regarding geological risks, avalanche hazards, internal travel management, MT 64 traffic safety, and wildlife impacts, it is not possible to find the new development in substantial compliance with the 2006 Madison County Growth Policy. Coordination with Gallatin County is important in working out the internal travel management system, including the provisions for secondary/emergency access.

<u>Conclusion</u>: It is not possible to conclude that the ODP will: (1) be in compliance with all applicable rules and regulations; (2) be in substantial compliance with the Madison County Growth Policy; and (3) have an acceptable impact on each of the six public interest criteria, plus other resources in the County, the local economy, and public services provided by other entities in the County.

STAFF RECOMMENDATION

Additional information is needed before Madison County can make an informed recommendation on the Lone Moose Meadows ODP. Items that should be provided include:

- Assessment by MDT, that the proposed new MT 64 access points and upper subdivision road routes are safe and likely to be approved.
- In coordination with Gallatin County, a more detailed travel management plan for moving people through the entire Lone Moose Meadows development in a safe, efficient, and neighborhood-friendly manner.
- A more comprehensive geological assessment, including a risk evaluation that documents that the proposed ODP development pods and road locations are in areas of low-tomoderate risk.
- An avalanche risk assessment, with mitigation strategies outlined as appropriate.
- A wildlife assessment that more fully describes wildlife use of the property and identifies
 which areas are the most/least suitable for development, and with what potential impacts.

Adequate time must be given to review the additional information, once it is provided.

Submitted by:		
•	Doris Fischer, Count	y Planning Director